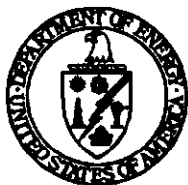


AROC

CCN FY 00-007833



Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

APR 19 2000

April 13, 2000

Mr. Wayne Pierre
Environmental Cleanup Office
U.S. Environmental Protection Agency Region X
1200 Sixth Avenue
Seattle, WA 98101

Mr. Dean Nygard, Bureau Chief
Idaho Department of Health and Welfare
Division of Environmental Quality
1410 North Hilton
Boise, ID 83706-1255

SUBJECT: Waste Area Group 7 – Request for Modification of Milestones
OU 7-10 - Staged Interim Action Project
OU 7-13/14 - Pits and Trenches Remedial Investigation and Feasibility
Study, (OPE-ER-63-00)

REFERENCES: 1) Letter, K. E. Hain/DOE-ID to J. Underwood/IDHW and W. Pierre/EPA,
"OU 7-10 Staged Interim Action – Continued Schedule Impacts from
Differing Professional Opinion," dated 5/21/99
2) Letter, K. E. Hain/DOE-ID to D. Nygard/IDHW and W. Pierre/EPA,
"Waste Area Group 7 Schedule issues" dated 8/24/99
3) Letter, K. E. Hain/DOE-ID to J. Underwood/IDHW and W. Pierre/EPA,
"OU 7-10 Staged Interim Action Project – Update on Progress and
Baseline Variances," dated 12/13/99

Dear Mr. Pierre and Mr. Nygard:

The U.S. Department of Energy (DOE) is notifying the state of Idaho and the Environmental Protection Agency, Region X that we would like to modify selected deadlines in the OU 7-10 and OU 7-13/14 projects, in order to proceed under a revised, comprehensive strategy for further characterization and remediation of the entire WAG 7. This request, in part, reflects the results of recent probing in Pit 9, which provided additional characterization and geo-physical information.

In cooperation with the agencies, significant success has been achieved over the last two years with both the OU 7-10 and the OU 7-13/14 projects. Although we've made good progress, we are at a point where the continued, simultaneous pursuit of both projects is no longer advisable. Building upon the information learned from Pit 9, we believe a synthesis of these efforts into a focused RI/FS is the best path forward for investigation of buried waste at the RWMC.

It is DOE's recommendation that ex situ treatment, in situ treatment and containment be systematically evaluated under the ongoing OU 7-13/14 RI/FS. This may require a ROD amendment to exercise the option to reevaluate the remedy for Pit 9. Bringing the balance of these two projects into alignment most effectively provides the technical and risk basis to proceed with the investigation and implementation of the most appropriate remedies for the entirety of the WAG 7.

DOE concludes that there is good cause to reevaluate the work plans and deadlines for the ongoing WAG 7 activities pursuant to Section XIII of the FFA/CO. Accordingly, DOE requests that the EPA and the IDHW agree to enter into timely negotiation with the DOE to appropriately adjust the WAG 7 work plans and deadlines to develop a course of action which best achieves success for remediation of the RWMC pits and trenches.

If there are any questions, please contact me (208-526-4392).

Sincerely,



Kathleen E. Hain, Director
Environmental Restoration Division